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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING FINAL DRAFT SOUTHWEST SOIL REMEDIATION WORK PLAN TECHNOLOGY DEMONSTRATION FOR LOW TEMPERATURE THERMAL DESORPTION NS MAYPORT FL

2/20/1996

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

February 20, 1996

Mr. Harold McGill
Department of the Navy
Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, PO Box 190010
North Charleston, SC 29419-9010

file: sws_wp_f.doc

RE: Final Draft, Southwest Soil Remediation, Inc. Work Plan, NELP Technology Demonstration for Low Temperature Thermal Desorption at SWMU 6 & 7, Naval Station Mayport, Florida

Dear Mr. McGill:

I have reviewed the above document (received February 6, 1996). Mr. Greg Brown, P.E., has also reviewed the document. Mr. Brown's comments are attached. The document is generally good and is suitable for its stated purpose; in addition to Mr. Brown's comments, I would like to add the following comments:

1. Section 1.2, Soil Excavation: the contractor is reminded of the necessity to place excavated pre-treatment soils on an impervious surface or liner as specified in Chapter 62-775.710 (3), F.A.C. Additionally, as pointed out by Mr. Brown, stockpiled post-treatment soils should be covered with plastic until they are proven to be clean since precipitation could leach contaminants from any soil that does not meet cleanup standards.

2. Page 5: the workplan states that Southwest Soil Remediation (SSR) will petition for an alternative procedure to obtaining metals analyses. The mention of the petition in the Work Plan does not constitute such a petition; additionally, the contractor is reminded of the need to demonstrate that the requested procedure provides a substantially equivalent degree of protection for the land, surface water and ground water of the state and that it is at least as effective as the established procedure or requirement. This portion of the workplan is predicated on approval of the alternative procedure by the Department; until such time as the alternative procedure is approved by the Department, metals analysis must be accomplished as stated in Chapter 62-775.400 (3), F.A.C. A similar discussion follows on pages 8 and 10 and these comments also apply in that regard.

3. Page 18, Cleanup Standards: the maximum concentration of Barium is 4940 mg/kg.

Please submit two copies of the Final Work Plan with the properly executed Engineers Certification to the Department. I will then append these comments to the final Work Plan.

Thank you for the opportunity to review the Work Plan. I look forward to beginning this project at Mayport. If you have questions or require further clarification, please contact me at (904) 488-3935.

Sincerely,

James H. Cason, P.G.
Remedial Project Manager

cc: Cheryl Mitchell, NAVSTA Mayport
David Driggers, SOUTHDIV, Charleston
Martha Berry, EPA Region IV, Atlanta

Enclosure (1)

TB JJC ESN

Florida Department of
Environmental Protection

Memorandum

TO: Jim Cason, P.G., Remedial Project Manager, Technical Review Section

THROUGH: Tim Bahr, P.G., Supervisor, Technical Review Section TB

FROM: Greg Brown, P.E., Professional Engineer II, GB
Technical Review Section

DATE: February 13, 1996

SUBJECT: Final Draft, Southwest soil Remediation, Inc., NELP Technology Demonstration for Low Temperature Thermal Desorption at SWMU 6 & 7; Naval Station Mayport, Florida.

I reviewed the subject document (received February 6, 1996). It is adequate for its intent as qualified by your review comments. Cecil Field NAS is using similar technology on a larger scale to remediate both CERCLA and UST sites. They initially used an open, lined, and bermed area to stage treated soils waiting verification sampling and analysis. Stormwater came into contact with the treated soil and accumulated inside the bermed area. Since it was unknown if the treated soil achieved cleanup standards, the Navy chose to manage the stormwater as wastewater. This soon became impractical due to the volume of stormwater generated. To solve this problem, the Navy has removed the berms (retaining the liner) to prevent stormwater accumulation, and they are shielding the treated soil from stormwater with impervious covers pending analytical results. The Mayport team may wish to consider a similar strategy at SWMU 6 & 7 using the "lessons learned" at Cecil Field.